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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
STEPHEN GRAY, individually and on :  
behalf of all others similarly situated, :  
Plaintiff, : Civil Action No: 07 Civ. 9790 (SHS)  
v. :  
CITIGROUP INC., CHARLES PRINCE, :  
THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC., :  
THE 401(k) INVESTMENT :  
COMMITTEE, and JOHN DOES 1 - 20, :  
Defendants.  
-----x

[Additional captions on the next page]

**NOTICE OF MOTION**  
**TO ADMIT MICHELLE C. YAU**  
**PRO HAC VICE**

US DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
CIVIL PRACTICE  
SECTION 2342  
CLERK'S OFFICE  
125 WEST 51ST STREET  
NEW YORK, NY 10019

-----x  
SHAUN ROSE, Individually and On :  
Behalf of All Others Similarly Situated, :  
: Plaintiff, : Civil Action No: 07 Civ. 10294  
v. :  
: CITIGROUP INC., CHARLES PRINCE, :  
THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC., :  
THE 401(k) INVESTMENT :  
COMMITTEE, and JOHN DOES 1 - 10, :  
: Defendants.  
-----x  
MEREDITH TRANBERG, individually :  
and on behalf of all others similarly situated :  
: Plaintiff, : Civil Action No: 07 Civ. 10341  
v. :  
: CITIGROUP INC., CHARLES PRINCE, :  
THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC., :  
THE 401(k) INVESTMENT :  
COMMITTEE, and JOHN DOES 1 - 20, :  
: Defendants.  
-----x  
ANTON RAPPOLD, individually and on :  
behalf of all others similarly situated, :  
: Plaintiff, : Civil Action No: 07 Civ. 10396  
v. :  
: CITIGROUP INC., CITIBANK, N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and JOHN :  
and JANE DOES 1 - 10, :  
: Defendants.

-----x  
 SAMIER TADROS, on Behalf of All :  
 Others Similarly Situated, :  
 :  
 Plaintiff, :  
 v. :  
 :  
 -----x

CITIGROUP INC., CHARLES O. :  
 PRINCE, C. MICHAEL ARMSTRONG, :  
 ALAIN J.P. BELDA, GEORGE DAVID, :  
 KENNETH T. DERR, JOHN M. DEUTCH, :  
 ROBERTO HERNANDEZ RAMIREZ, :  
 ANN DIBBLE JORDAN, KLAUS :  
 KLEINFELD, ANDREW N. LIVERIS, :  
 ANNE MULCAHY, RICHARD D. :  
 PARSONS, JUDITH RODIN, ROBERT E. :  
 RUBIN, ROBERT E. RUBIN, FRANKLIN :  
 A. THOMAS, JOHN DOES 1-20 (BEING :  
 CURRENT AND FORMER MEMBERS :  
 OF THE PLANS ADMINISTRATIVE :  
 COMMITTEE OF CITIGROUP INC.) :  
 and JOHN DOES 21-40 (BEING :  
 CURRENT AND FORMER MEMBERS :  
 OF THE INVESTMENT COMMITTEE :  
 OF THE CITIGROUP INC. 401(K) PLAN), :  
 :  
 Defendants. :  
 -----x

STEPHAN FIORINO, individually and on :  
 behalf of all others similarly situated, :  
 :  
 -----x

Plaintiff, :  
 v. :  
 :  
 CITIGROUP INC., CITIBANK N.A., :  
 CHARLES PRINCE, THE PLANS :  
 ADMINISTRATIVE COMMITTEE OF :  
 CITIGROUP INC., THE 401(k) :  
 INVESTMENT COMMITTEE, and :  
 JOHN DOES 1 - 20, :  
 :  
 Defendants. :  
 -----x

-----X  
 JAMES BOLLA, individually and on behalf :  
 of all others similarly situated, :  
 Plaintiff, : Civil Action No: 07 Civ. 10461  
 v. :  
 CITIGROUP INC., CITIBANK N.A., :  
 CHARLES PRINCE, THE PLANS :  
 ADMINISTRATIVE COMMITTEE OF :  
 CITIGROUP INC., THE 401(k) :  
 INVESTMENT COMMITTEE, and :  
 JOHN DOES 1 - 20, :  
 Defendants. :  
 -----X  
 MARK GEROULO, individually, on behalf :  
 of the CITIGROUP 401(k) Plan, the :  
 CITIBUILDER 401 (K) PLAN FOR :  
 PUERTO RICO, and all others similarly, :  
 Plaintiff, : Civil Action No: 07 Civ. 10472  
 v. :  
 CITIGROUP, INC., CITIBANK, N.A., :  
 THE PLAN ADMINISTRATIVE :  
 COMMITTEE OF CITIGROUP, INC., :  
 MICHAEL E. SCHLEIN, JOHN DOES :  
 1-10, THE CITIGROUP 401(k) PLAN :  
 INVESTMENT COMMITTEE and JOHN :  
 DOES 10-20, C. MICHAEL :  
 ARMSTRONG, ALAN J.P. BELDA, :  
 GEORGE DAVID, KENNETH T. DERR, :  
 JOHN M. DEUTCH, ROBERTO :  
 HERNANDEZ, ANN DIBBLE JORDAN, :  
 ANDREW N. LIVERIS, DUDLEY C. :  
 MECUM, ANNE M. MULCAHY, :  
 RICHARD D. PARSONS, ANDRALL E. :  
 PEARSON, CHARLES PRINCE, JUDITH :  
 RODIN, ROBERT E. RUBIN, FRANKLIN :  
 A. THOMAS, SANFORD I. WEILL, :  
 Defendants. :  
 -----X

-----x  
 ALAN STEVENS, on Behalf of Himself :  
 and All Others Similarly Situated, :  
 Plaintiff, : Civil Action No: 07 Civ. 11156  
 v. :  
 CITIGROUP INC., CITIBANK, N.A. :  
 CHARLES PRINCE, C. MICHAEL :  
 ARMSTRONG, ALAIN J.P. BELDA, :  
 GEORGE DAVID, KENNETH T. DERR, :  
 JOHN M. DEUTCH, PETER JOHNSON, :  
 ROBERTO HERNANDEZ RAMIREZ, :  
 ANDREW N. LIVERIS, ANNE :  
 MULCAHEY, RICHARD D. PARSONS, :  
 JUDITH RODIN, ROBERT E. RUBIN, :  
 ROBERT L. RYAN, FRANKLIN A. :  
 THOMAS, THE PLANS :  
 ADMINISTRATION COMMITTEE OF :  
 CITIGROUP, INC., THE INVESTMENT :  
 COMMITTEE and JOHN DOES 1-30, :  
 Defendants.  
 -----x  
 STEPHEN GOLDSTEIN, on Behalf of :  
 Himself and a Class of Persons Similarly :  
 Situated, :  
 Plaintiff, : Civil Action No: 07 Civ. 11158  
 v. :  
 CITIGROUP INC., THE PLANS :  
 ADMINISTRATION COMMITTEE OF :  
 CITIGROUP, INC., MICHAEL E. :  
 SCHLEIN, CHARLES PRINCE, C. :  
 MICHAEL ARMSTRONG, ALAIN J.P. :  
 BELDA, GEORGE DAVID, KENNETH T. :  
 DERR, JOHN M. DEUTCH, ROBERTO :  
 HERNANDEZ RAMIREZ, ANDREW N. :  
 LIVERIS, ANNE MULCAHEY, :  
 RICHARD D. PARSONS, JUDITH :  
 RODIN, ROBERT E. RUBIN, ROBERT L. :  
 RYAN, AND FRANKLIN A. THOMAS, :  
 And JOHN DOES 1-30,  
 Defendants.

-----x

CHRIS SOUTHARD, on Behalf of All	:
Others Similarly Situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES O.	:
PRINCE, C. MICHAEL ARMSTRONG,	:
ALAIN J.P. BELDA, GEORGE DAVID,	:
KENNETH T. DERR, JOHN M. DEUTCH,	:
ROBERTO HERNANDEZ RAMIREZ,	:
ANN DIBBLE JORDAN, KLAUS	:
KLEINFELD, ANDREW N. LIVERIS,	:
ANNE MULCAHY, RICHARD D.	:
PARSONS, JUDITH RODIN, ROBERT E.	:
RUBIN, ROBERT E. RUBIN, FRANKLIN	:
A. THOMAS, JOHN DOES 1-20 (BEING	:
CURRENT AND FORMER MEMBERS	:
OF THE PLANS ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP INC.)	:
and JOHN DOES 21-40 (BEING	:
CURRENT AND FORMER MEMBERS	:
OF THE INVESTMENT COMMITTEE	:
OF THE CITIGROUP INC. 401(K) PLAN),	:
	:
Defendants.	:

---

FRANCIA BRICK, individually and on	:
Behalf of all others similarly situated,	:
	:
Plaintiff,	:
v.	:
	:
CITIGROUP INC., CHARLES PRINCE,	:
THE PLAN'S ADMINISTRATIVE	:
COMMITTEE OF CITIGROUP, INC.,	:
THE 401(k) INVESTMENT COMMITTEE,	:
And JOHN DOES 1-10,	:
	:
Defendants.	:

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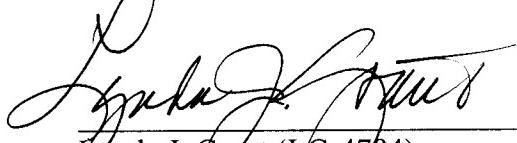
-----x  
WILLIAM and PATRICIA WOODWARD, :  
individually and on Behalf of All Others :  
Similarly Situated, :  
: Plaintiffs, : Civil Action No: 07cv11207  
v. :  
: CITIGROUP INC., CHARLES PRINCE, :  
ROBERT E. RUBIN, C. MICHAEL :  
ARMSTRONG, ALAIN J. P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ RAMIREZ, ANDREW N. :  
LIVERIS, ANN MULCAHEY, RICHARD :  
D. PARSONS, JUDITH RODIN, ROBERT :  
L. RYAN, FRANKLIN A. THOMAS, ANN :  
DIBBLE JORDAN, KLAUS KLEINFELD :  
AND DUDLEY C. MECUM, and JOHN :  
and JANE DOES 1-10, :  
: Defendants. :  
-----

**PLEASE TAKE NOTICE** that upon the annexed Declaration of Lynda J. Grant,  
the Affidavit of Michelle C. Yau and the Certificate of Good Standing annexed thereto,  
the undersigned will move this Court, before the Honorable Sidney H. Stein on a date to  
be determined by the Court, in the United States Courthouse, 500 Pearl Street, Courtroom  
23A, New York, New York 10007, for an Order (attached hereto), pursuant to Rule

1.3(c) of the Local Rules of the United States District Courts for the Southern District and Eastern Districts of New York, admitting Michelle C. Yau *pro hac vice*.

Dated: January \_\_, 2008

Respectfully submitted,



Lynda J. Grant (LG-4784)

**COHEN, MILSTEIN, HAUSFELD  
& TOLL, P.L.L.C.**

150 East 52<sup>nd</sup> Street, 30<sup>th</sup> Floor  
New York, New York 10022  
(212) 838-7797

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
STEPHEN GRAY, individually and on :  
behalf of all others similarly situated, :  
: Civil Action No: 07 Civ. 9790 (SHS)  
Plaintiff, :  
v. :  
:  
CITIGROUP INC., CHARLES PRINCE, :  
THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC., :  
THE 401(k) INVESTMENT :  
COMMITTEE, and JOHN DOES 1 - 20, :  
: Defendants.  
-----x

[Additional captions on the next page]

**DECLARATION OF LYNDA J. GRANT IN SUPPORT  
OF MOTION TO ADMIT COUNSEL *PRO HAC VICE***

-----x  
SHAUN ROSE, Individually and On :  
Behalf of All Others Similarly Situated, :  
: Plaintiff, : Civil Action No: 07 Civ. 10294  
v. :  
: CITIGROUP INC., CHARLES PRINCE, :  
THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC., :  
THE 401(k) INVESTMENT :  
COMMITTEE, and JOHN DOES 1 - 10, :  
: Defendants.  
-----x  
MEREDITH TRANBERG, individually :  
and on behalf of all others similarly situated :  
: Plaintiff, : Civil Action No: 07 Civ. 10341  
v. :  
: CITIGROUP INC., CHARLES PRINCE, :  
THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC., :  
THE 401(k) INVESTMENT :  
COMMITTEE, and JOHN DOES 1 - 20, :  
: Defendants.  
-----x  
ANTON RAPPOLD, individually and on :  
behalf of all others similarly situated, :  
: Plaintiff, : Civil Action No: 07 Civ. 10396  
v. :  
: CITIGROUP INC., CITIBANK, N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and JOHN :  
and JANE DOES 1 - 10, :  
: Defendants.

-----x  
SAMIER TADROS, on Behalf of All :  
Others Similarly Situated, :  
:

Plaintiff, : Civil Action No: 07 Civ. 10442  
v. :  
:

CITIGROUP INC., CHARLES O. :  
PRINCE, C. MICHAEL ARMSTRONG, :  
ALAIN J.P. BELDA, GEORGE DAVID, :  
KENNETH T. DERR, JOHN M. DEUTCH, :  
ROBERTO HERNANDEZ RAMIREZ, :  
ANN DIBBLE JORDAN, KLAUS :  
KLEINFELD, ANDREW N. LIVERIS, :  
ANNE MULCAHY, RICHARD D. :  
PARSONS, JUDITH RODIN, ROBERT E. :  
RUBIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, JOHN DOES 1-20 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC.) :  
and JOHN DOES 21-40 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE INVESTMENT COMMITTEE :  
OF THE CITIGROUP INC. 401(K) PLAN), :  
:

Defendants. :  
-----x

STEPHAN FIORINO, individually and on :  
behalf of all others similarly situated, :  
:

Plaintiff, : Civil Action No: 07 Civ. 10458  
v. :  
:

CITIGROUP INC., CITIBANK N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and :  
JOHN DOES 1 - 20, :  
:

Defendants. :  
-----x

-----x  
 JAMES BOLLA, individually and on behalf :  
 of all others similarly situated, :  
 Plaintiff, : Civil Action No: 07 Civ. 10461  
 v. :  
 CITIGROUP INC., CITIBANK N.A., :  
 CHARLES PRINCE, THE PLANS :  
 ADMINISTRATIVE COMMITTEE OF :  
 CITIGROUP INC., THE 401(k) :  
 INVESTMENT COMMITTEE, and :  
 JOHN DOES 1 - 20, :  
 Defendants.  
 -----x  
 MARK GEROULO, individually, on behalf :  
 of the CITIGROUP 401(k) Plan, the :  
 CITIBUILDER 401 (K) PLAN FOR :  
 PUERTO RICO, and all others similarly, :  
 Plaintiff, : Civil Action No: 07 Civ. 10472  
 v. :  
 CITIGROUP, INC., CITIBANK, N.A., :  
 THE PLAN ADMINISTRATIVE :  
 COMMITTEE OF CITIGROUP, INC., :  
 MICHAEL E. SCHLEIN, JOHN DOES :  
 1-10, THE CITIGROUP 401(k) PLAN :  
 INVESTMENT COMMITTEE and JOHN :  
 DOES 10-20, C. MICHAEL :  
 ARMSTRONG, ALAN J.P. BELDA, :  
 GEORGE DAVID, KENNETH T. DERR, :  
 JOHN M. DEUTCH, ROBERTO :  
 HERNANDEZ, ANN DIBBLE JORDAN, :  
 ANDREW N. LIVERIS, DUDLEY C. :  
 MECUM, ANNE M. MULCAHY, :  
 RICHARD D. PARSONS, ANDRALL E. :  
 PEARSON, CHARLES PRINCE, JUDITH :  
 RODIN, ROBERT E. RUBIN, FRANKLIN :  
 A. THOMAS, SANFORD I. WEILL, :  
 Defendants.  
 -----x

-----x  
 ALAN STEVENS, on Behalf of Himself :  
 and All Others Similarly Situated, :  
 Plaintiff, : Civil Action No: 07 Civ. 11156  
 v. :  
 CITIGROUP INC., CITIBANK, N.A, :  
 CHARLES PRINCE, C. MICHAEL :  
 ARMSTRONG, ALAIN J.P. BELDA, :  
 GEORGE DAVID, KENNETH T. DERR, :  
 JOHN M. DEUTCH, PETER JOHNSON, :  
 ROBERTO HERNANDEZ RAMIREZ, :  
 ANDREW N. LIVERIS, ANNE :  
 MULCAHEY, RICHARD D. PARSONS, :  
 JUDITH RODIN, ROBERT E. RUBIN, :  
 ROBERT L. RYAN, FRANKLIN A. :  
 THOMAS, THE PLANS :  
 ADMINISTRATION COMMITTEE OF :  
 CITIGROUP, INC., THE INVESTMENT :  
 COMMITTEE and JOHN DOES 1-30, :  
 Defendants. :  
 -----x  
 STEPHEN GOLDSTEIN, on Behalf of :  
 Himself and a Class of Persons Similarly :  
 Situated, :  
 Plaintiff, : Civil Action No: 07 Civ. 11158  
 v. :  
 CITIGROUP INC., THE PLANS :  
 ADMINISTRATION COMMITTEE OF :  
 CITIGROUP, INC., MICHAEL E. :  
 SCHLEIN, CHARLES PRINCE, C. :  
 MICHAEL ARMSTRONG, ALAIN J.P. :  
 BELDA, GEORGE DAVID, KENNETH T. :  
 DERR, JOHN M. DEUTCH, ROBERTO :  
 HERNANDEZ RAMIREZ, ANDREW N. :  
 LIVERIS, ANNE MULCAHEY, :  
 RICHARD D. PARSONS, JUDITH :  
 RODIN, ROBERT E. RUBIN, ROBERT L. :  
 RYAN, AND FRANKLIN A. THOMAS, :  
 And JOHN DOES 1-30, :  
 Defendants.

-----x  
 CHRIS SOUTHARD, on Behalf of All  
 Others Similarly Situated,

Plaintiff,

Civil Action No: 07 Civ. 11164

v.

CITIGROUP INC., CHARLES O.  
 PRINCE, C. MICHAEL ARMSTRONG,  
 ALAIN J.P. BELDA, GEORGE DAVID,  
 KENNETH T. DERR, JOHN M. DEUTCH,  
 ROBERTO HERNANDEZ RAMIREZ,  
 ANN DIBBLE JORDAN, KLAUS  
 KLEINFELD, ANDREW N. LIVERIS,  
 ANNE MULCAHY, RICHARD D.  
 PARSONS, JUDITH RODIN, ROBERT E.  
 RUBIN, ROBERT E. RUBIN, FRANKLIN  
 A. THOMAS, JOHN DOES 1-20 (BEING  
 CURRENT AND FORMER MEMBERS  
 OF THE PLANS ADMINISTRATIVE  
 COMMITTEE OF CITIGROUP INC.)  
 and JOHN DOES 21-40 (BEING  
 CURRENT AND FORMER MEMBERS  
 OF THE INVESTMENT COMMITTEE  
 OF THE CITIGROUP INC. 401(K) PLAN),

Defendants.

-----  
 FRANCIA BRICK, individually and on  
 Behalf of all others similarly situated,

Plaintiff,

Civil Action No: 07 Civ. 11369

v.

CITIGROUP INC., CHARLES PRINCE,  
 THE PLAN'S ADMINISTRATIVE  
 COMMITTEE OF CITIGROUP, INC.,  
 THE 401(k) INVESTMENT COMMITTEE,  
 And JOHN DOES 1-10,

Defendants.

-----x  
WILLIAM and PATRICIA WOODWARD, :  
individually and on Behalf of All Others :  
Similarly Situated, :  
Plaintiffs, : Civil Action No: 07cv11207  
v. :  
CITIGROUP INC., CHARLES PRINCE, :  
ROBERT E. RUBIN, C. MICHAEL :  
ARMSTRONG, ALAIN J. P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ RAMIREZ, ANDREW N. :  
LIVERIS, ANN MULCAHEY, RICHARD :  
D. PARSONS, JUDITH RODIN, ROBERT :  
L. RYAN, FRANKLIN A. THOMAS, ANN :  
DIBBLE JORDAN, KLAUS KLEINFELD :  
AND DUDLEY C. MECUM, and JOHN :  
and JANE DOES 1-10, :  
Defendants. :  
-----

I, Lynda J. Grant, hereby declare as follows:

1. I am an attorney admitted to practice in the State of New York, and in the Southern and Eastern Districts of New York. I submit this Declaration in support of the motion to admit Michelle C. Yau to the United States District Court for the Southern District of New York *pro hac vice* for purposes of this action.

2. I agree to act as local counsel for Michelle C. Yau and to observe the Rules of this Court governing the conduct of attorneys.

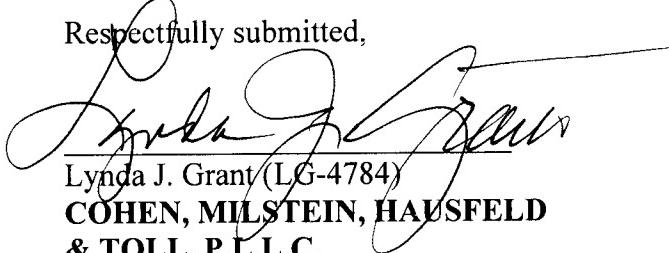
3. Michelle C. Yau is a member in good standing of the Bar of the Commonwealth of Massachusetts.

For the foregoing reasons, it is respectfully requested that Michelle C. Yau be admitted *pro hac vice* to the United States District Court for the Southern District of New York for purposes of this action.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: January \_\_\_, 2008

Respectfully submitted,



Lynda J. Grant (LG-4784)  
**COHEN, MILSTEIN, HAUSFELD  
& TOLL, P.L.L.C.**  
150 East 52<sup>nd</sup> Street, 30<sup>th</sup> Floor  
New York, New York 10022  
(212) 838-7797

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
STEPHEN GRAY, individually and on :  
behalf of all others similarly situated, :  
:  
Plaintiff, : Civil Action No: 07 Civ. 9790 (SHS)  
v. :  
:  
CITIGROUP INC., CHARLES PRINCE, :  
THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC., :  
THE 401(k) INVESTMENT :  
COMMITTEE, and JOHN DOES 1 - 20, :  
:  
Defendants. :  
-----x

*[Additional captions on the next page]*

**AFFIDAVIT OF MICHELLE C. YAU IN SUPPORT OF  
APPLICATION FOR ADMISSION PRO HAC VICE**

-----x

SHAUN ROSE, Individually and On Behalf of All Others Similarly Situated,	:	
Plaintiff,	:	Civil Action No: 07 Civ. 10294
v.	:	
CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 10,	:	
Defendants.	:	

-----x

MEREDITH TRANBERG, individually and on behalf of all others similarly situated	:	
Plaintiff,	:	Civil Action No: 07 Civ. 10341
v.	:	
CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,	:	
Defendants.	:	

-----x

ANTON RAPPOLD, individually and on behalf of all others similarly situated,	:	
Plaintiff,	:	Civil Action No: 07 Civ. 10396
v.	:	
CITIGROUP INC., CITIBANK, N.A., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN and JANE DOES 1 - 10,	:	
Defendants.	:	

-----x  
 SAMIER TADROS, on Behalf of All  
 Others Similarly Situated,

Plaintiff, :

v.

Civil Action No: 07 Civ. 10442

CITIGROUP INC., CHARLES O.  
 PRINCE, C. MICHAEL ARMSTRONG,  
 ALAIN J.P. BELDA, GEORGE DAVID,  
 KENNETH T. DERR, JOHN M. DEUTCH,  
 ROBERTO HERNANDEZ RAMIREZ,  
 ANN DIBBLE JORDAN, KLAUS  
 KLEINFELD, ANDREW N. LIVERIS,  
 ANNE MULCAHY, RICHARD D.  
 PARSONS, JUDITH RODIN, ROBERT E.  
 RUBIN, ROBERT E. RUBIN, FRANKLIN  
 A. THOMAS, JOHN DOES 1-20 (BEING  
 CURRENT AND FORMER MEMBERS  
 OF THE PLANS ADMINISTRATIVE  
 COMMITTEE OF CITIGROUP INC.)  
 and JOHN DOES 21-40 (BEING  
 CURRENT AND FORMER MEMBERS  
 OF THE INVESTMENT COMMITTEE  
 OF THE CITIGROUP INC. 401(K) PLAN),

Defendants. :

-----x  
 STEPHAN FIORINO, individually and on  
 behalf of all others similarly situated,

Plaintiff, :

v.

Civil Action No: 07 Civ. 10458

CITIGROUP INC., CITIBANK N.A.,  
 CHARLES PRINCE, THE PLANS  
 ADMINISTRATIVE COMMITTEE OF  
 CITIGROUP INC., THE 401(k)  
 INVESTMENT COMMITTEE, and  
 JOHN DOES 1 - 20,

Defendants. :

-----x  
JAMES BOLLA, individually and on behalf :  
of all others similarly situated,  
:

Plaintiff,

Civil Action No: 07 Civ. 10461

v.

CITIGROUP INC., CITIBANK N.A.,  
CHARLES PRINCE, THE PLANS  
ADMINISTRATIVE COMMITTEE OF  
CITIGROUP INC., THE 401(k)  
INVESTMENT COMMITTEE, and  
JOHN DOES 1 - 20,

Defendants.

-----x  
MARK GEROULO, individually, on behalf :  
of the CITIGROUP 401(k) Plan, the  
CITIBUILDER 401 (K) PLAN FOR  
PUERTO RICO, and all others similarly,

Plaintiff,

Civil Action No: 07 Civ. 10472

v.

CITIGROUP, INC., CITIBANK, N.A.,  
THE PLAN ADMINISTRATIVE  
COMMITTEE OF CITIGROUP, INC.,  
MICHAEL E. SCHLEIN, JOHN DOES  
1-10, THE CITIGROUP 401(k) PLAN  
INVESTMENT COMMITTEE and JOHN  
DOES 10-20, C. MICHAEL  
ARMSTRONG, ALAN J.P. BELDA,  
GEORGE DAVID, KENNETH T. DERR,  
JOHN M. DEUTCH, ROBERTO  
HERNANDEZ, ANN DIBBLE JORDAN,  
ANDREW N. LIVERIS, DUDLEY C.  
MECUM, ANNE M. MULCAHY,  
RICHARD D. PARSONS, ANDRALL E.  
PEARSON, CHARLES PRINCE, JUDITH  
RODIN, ROBERT E. RUBIN, FRANKLIN  
A. THOMAS, SANFORD I. WEILL,

Defendants.

-----x  
 ALAN STEVENS, on Behalf of Himself  
 and All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CITIBANK, N.A.,  
 CHARLES PRINCE, C. MICHAEL  
 ARMSTRONG, ALAIN J.P. BELDA,  
 GEORGE DAVID, KENNETH T. DERR,  
 JOHN M. DEUTCH, PETER JOHNSON,  
 ROBERTO HERNANDEZ RAMIREZ,  
 ANDREW N. LIVERIS, ANNE  
 MULCAHEY, RICHARD D. PARSONS,  
 JUDITH RODIN, ROBERT E. RUBIN,  
 ROBERT L. RYAN, FRANKLIN A.  
 THOMAS, THE PLANS  
 ADMINISTRATION COMMITTEE OF  
 CITIGROUP, INC., THE INVESTMENT  
 COMMITTEE and JOHN DOES 1-30,

Defendants.

-----x  
 STEPHEN GOLDSTEIN, on Behalf of  
 Himself and a Class of Persons Similarly  
 Situated,

Plaintiff,

v.

CITIGROUP INC., THE PLANS  
 ADMINISTRATION COMMITTEE OF  
 CITIGROUP, INC., MICHAEL E.  
 SCHLEIN, CHARLES PRINCE, C.  
 MICHAEL ARMSTRONG, ALAIN J.P.  
 BELDA, GEORGE DAVID, KENNETH T.  
 DERR, JOHN M. DEUTCH, ROBERTO  
 HERNANDEZ RAMIREZ, ANDREW N.  
 LIVERIS, ANNE MULCAHEY,  
 RICHARD D. PARSONS, JUDITH  
 RODIN, ROBERT E. RUBIN, ROBERT L.  
 RYAN, AND FRANKLIN A. THOMAS,  
 And JOHN DOES 1-30,

Defendants.

Civil Action No: 07 Civ. 11156

Civil Action No: 07 Civ. 11158

-----x  
CHRIS SOUTHARD, on Behalf of All :  
Others Similarly Situated, :

Plaintiff, : Civil Action No: 07 Civ. 11164  
v. :

CITIGROUP INC., CHARLES O. :  
PRINCE, C. MICHAEL ARMSTRONG, :  
ALAIN J.P. BELDA, GEORGE DAVID, :  
KENNETH T. DERR, JOHN M. DEUTCH, :  
ROBERTO HERNANDEZ RAMIREZ, :  
ANN DIBBLE JORDAN, KLAUS :  
KLEINFELD, ANDREW N. LIVERIS, :  
ANNE MULCAHY, RICHARD D. :  
PARSONS, JUDITH RODIN, ROBERT E. :  
RUBIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, JOHN DOES 1-20 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC.) :  
and JOHN DOES 21-40 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE INVESTMENT COMMITTEE :  
OF THE CITIGROUP INC. 401(K) PLAN), :

Defendants. :

-----FRANCIA BRICK, individually and on :  
Behalf of all others similarly situated, :

Plaintiff, : Civil Action No: 07 Civ. 11369  
v. :

CITIGROUP INC., CHARLES PRINCE, :  
THE PLAN'S ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP, INC., :  
THE 401(k) INVESTMENT COMMITTEE, :  
And JOHN DOES 1-10, :

Defendants. :

-----x

WILLIAM and PATRICIA WOODWARD, :	
individually and on Behalf of All Others :	
Similarly Situated, :	
 Plaintiffs, :	Civil Action No: 07cv11207
v. :	
 CITIGROUP INC., CHARLES PRINCE, :	
ROBERT E. RUBIN, C. MICHAEL :	
ARMSTRONG, ALAIN J. P. BELDA, :	
GEORGE DAVID, KENNETH T. DERR, :	
JOHN M. DEUTCH, ROBERTO :	
HERNANDEZ RAMIREZ, ANDREW N. :	
LIVERIS, ANN MULCAHEY, RICHARD :	
D. PARSONS, JUDITH RODIN, ROBERT :	
L. RYAN, FRANKLIN A. THOMAS, ANN :	
DIBBLE JORDAN, KLAUS KLEINFELD :	
AND DUDLEY C. MECUM, and JOHN :	
and JANE DOES 1-10, :	
 Defendants. :	

-----

Michelle C. Yau, being duly sworn, deposes and says:

1. I am an attorney duly admitted to and a member in good standing of the Bar of the Commonwealth of Massachusetts. I am an associate with the law firm of Cohen, Milstein, Hausfeld & Toll, P.L.L.C., attorneys for co-counsel to plaintiff. I make this affidavit in support of the application for my admission *pro hac vice* to this Court.

2. I have participated in the prosecution of this action and am familiar with the litigation.

3. Attached hereto as Exhibit A is a Certificate of Good Standing issued by the Supreme Judicial Court of the Commonwealth of Massachusetts, which states that I have been duly admitted to and am a member in good standing.



Michelle C. Yau

Sworn to and subscribed before me  
this 24th day of January, 2008



Notary Public

**BERNADETTE SMITH  
NOTARY PUBLIC  
District of Columbia  
My Commission Expires December 14, 2011**

**COMMONWEALTH OF MASSACHUSETTS**

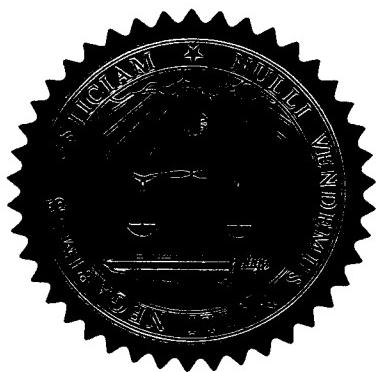
SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston  
within and for said County of Suffolk, on the **twenty-seventh**  
day of **May** A.D. **2004**, said Court being the highest  
Court of Record in said Commonwealth:

Michelle C. Yau

being found duly qualified in that behalf, and having taken and subscribed  
the oaths required by law, was admitted to practice as an Attorney, and, by  
virtue thereof, as a Counsellor at Law, in any of the Courts of the said  
Commonwealth: that said Attorney is at present a member of the Bar, and  
is in good standing according to the records of this Court\*.

In testimony whereof, I have hereunto set my hand and affixed the  
seal of said Court, this **eleventh** day of **January**  
in the year of our Lord **two thousand and eight**.



A handwritten signature in black ink, appearing to read "Maura S. Doyle".  
**MAURA S. DOYLE, Clerk**

\* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----x  
STEPHEN GRAY, individually and on :  
behalf of all others similarly situated, :  
v. :  
Plaintiff, : Civil Action No: 07 Civ. 9790 (SHS)  
CITIGROUP INC., CHARLES PRINCE, :  
THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC., :  
THE 401(k) INVESTMENT :  
COMMITTEE, and JOHN DOES 1 - 20, :  
Defendants. :  
-----x

[Additional captions on the next page]

**[PROPOSED] ORDER GRANTING APPLICATION OF  
MICHELLE C. YAU FOR ADMISSION PRO HAC VICE**

-----x  
 SHAUN ROSE, Individually and On :  
 Behalf of All Others Similarly Situated, :  
 Plaintiff, : Civil Action No: 07 Civ. 10294  
 v. :  
 CITIGROUP INC., CHARLES PRINCE, :  
 THE PLANS ADMINISTRATIVE :  
 COMMITTEE OF CITIGROUP INC., :  
 THE 401(k) INVESTMENT :  
 COMMITTEE, and JOHN DOES 1 - 10, :  
 Defendants.  
 -----x  
 MEREDITH TRANBERG, individually :  
 and on behalf of all others similarly situated :  
 Plaintiff, : Civil Action No: 07 Civ. 10341  
 v. :  
 CITIGROUP INC., CHARLES PRINCE, :  
 THE PLANS ADMINISTRATIVE :  
 COMMITTEE OF CITIGROUP INC., :  
 THE 401(k) INVESTMENT :  
 COMMITTEE, and JOHN DOES 1 - 20, :  
 Defendants.  
 -----x  
 ANTON RAPPOLD, individually and on :  
 behalf of all others similarly situated, :  
 Plaintiff, : Civil Action No: 07 Civ. 10396  
 v. :  
 CITIGROUP INC., CITIBANK, N.A., :  
 CHARLES PRINCE, THE PLANS :  
 ADMINISTRATIVE COMMITTEE OF :  
 CITIGROUP INC., THE 401(k) :  
 INVESTMENT COMMITTEE, and JOHN :  
 and JANE DOES 1 - 10, :  
 Defendants.

-----x  
SAMIER TADROS, on Behalf of All  
Others Similarly Situated,

Plaintiff, :

Civil Action No: 07 Civ. 10442

v.

CITIGROUP INC., CHARLES O.  
PRINCE, C. MICHAEL ARMSTRONG,  
ALAIN J.P. BELDA, GEORGE DAVID,  
KENNETH T. DERR, JOHN M. DEUTCH,  
ROBERTO HERNANDEZ RAMIREZ,  
ANN DIBBLE JORDAN, KLAUS  
KLEINFELD, ANDREW N. LIVERIS,  
ANNE MULCAHY, RICHARD D.  
PARSONS, JUDITH RODIN, ROBERT E.  
RUBIN, ROBERT E. RUBIN, FRANKLIN  
A. THOMAS, JOHN DOES 1-20 (BEING  
CURRENT AND FORMER MEMBERS  
OF THE PLANS ADMINISTRATIVE  
COMMITTEE OF CITIGROUP INC.)  
and JOHN DOES 21-40 (BEING  
CURRENT AND FORMER MEMBERS  
OF THE INVESTMENT COMMITTEE  
OF THE CITIGROUP INC. 401(K) PLAN),

Defendants. :

-----x  
STEPHAN FIORINO, individually and on  
behalf of all others similarly situated,

Plaintiff, :

Civil Action No: 07 Civ. 10458

v.

CITIGROUP INC., CITIBANK N.A.,  
CHARLES PRINCE, THE PLANS  
ADMINISTRATIVE COMMITTEE OF  
CITIGROUP INC., THE 401(k)  
INVESTMENT COMMITTEE, and  
JOHN DOES 1 - 20,

Defendants. :

-----x  
JAMES BOLLA, individually and on behalf :  
of all others similarly situated,  
:

Plaintiff, : Civil Action No: 07 Civ. 10461  
v.  
:

CITIGROUP INC., CITIBANK N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and :  
JOHN DOES 1 - 20, :  
:

Defendants. :  
-----x

MARK GEROULO, individually, on behalf :  
of the CITIGROUP 401(k) Plan, the :  
CITIBUILDER 401 (K) PLAN FOR :  
PUERTO RICO, and all others similarly, :  
:

Plaintiff, : Civil Action No: 07 Civ. 10472  
v.  
:

CITIGROUP, INC., CITIBANK, N.A., :  
THE PLAN ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP, INC., :  
MICHAEL E. SCHLEIN, JOHN DOES :  
1-10, THE CITIGROUP 401(k) PLAN :  
INVESTMENT COMMITTEE and JOHN :  
DOES 10-20, C. MICHAEL :  
ARMSTRONG, ALAN J.P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ, ANN DIBBLE JORDAN, :  
ANDREW N. LIVERIS, DUDLEY C. :  
MECUM, ANNE M. MULCAHY, :  
RICHARD D. PARSONS, ANDRALL E. :  
PEARSON, CHARLES PRINCE, JUDITH :  
RODIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, SANFORD I. WEILL, :  
:

Defendants. :  
-----x

-----x  
 ALAN STEVENS, on Behalf of Himself  
 and All Others Similarly Situated,

Plaintiff,

v.

CITIGROUP INC., CITIBANK, N.A.,  
 CHARLES PRINCE, C. MICHAEL  
 ARMSTRONG, ALAIN J.P. BELDA,  
 GEORGE DAVID, KENNETH T. DERR,  
 JOHN M. DEUTCH, PETER JOHNSON,  
 ROBERTO HERNANDEZ RAMIREZ,  
 ANDREW N. LIVERIS, ANNE  
 MULCAHEY, RICHARD D. PARSONS,  
 JUDITH RODIN, ROBERT E. RUBIN,  
 ROBERT L. RYAN, FRANKLIN A.  
 THOMAS, THE PLANS  
 ADMINISTRATION COMMITTEE OF  
 CITIGROUP, INC., THE INVESTMENT  
 COMMITTEE and JOHN DOES 1-30,

Defendants.

-----x  
 STEPHEN GOLDSTEIN, on Behalf of  
 Himself and a Class of Persons Similarly  
 Situated,

Plaintiff,

v.

CITIGROUP INC., THE PLANS  
 ADMINISTRATION COMMITTEE OF  
 CITIGROUP, INC., MICHAEL E.  
 SCHLEIN, CHARLES PRINCE, C.  
 MICHAEL ARMSTRONG, ALAIN J.P.  
 BELDA, GEORGE DAVID, KENNETH T.  
 DERR, JOHN M. DEUTCH, ROBERTO  
 HERNANDEZ RAMIREZ, ANDREW N.  
 LIVERIS, ANNE MULCAHEY,  
 RICHARD D. PARSONS, JUDITH  
 RODIN, ROBERT E. RUBIN, ROBERT L.  
 RYAN, AND FRANKLIN A. THOMAS,  
 And JOHN DOES 1-30,

Defendants.

Civil Action No: 07 Civ. 11156

Civil Action No: 07 Civ. 11158

-----x  
CHRIS SOUTHARD, on Behalf of All :  
Others Similarly Situated, :

Plaintiff, :

v.

Civil Action No: 07 Civ. 11164

CITIGROUP INC., CHARLES O. :  
PRINCE, C. MICHAEL ARMSTRONG, :  
ALAIN J.P. BELDA, GEORGE DAVID, :  
KENNETH T. DERR, JOHN M. DEUTCH, :  
ROBERTO HERNANDEZ RAMIREZ, :  
ANN DIBBLE JORDAN, KLAUS :  
KLEINFELD, ANDREW N. LIVERIS, :  
ANNE MULCAHY, RICHARD D. :  
PARSONS, JUDITH RODIN, ROBERT E. :  
RUBIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, JOHN DOES 1-20 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC.) :  
and JOHN DOES 21-40 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE INVESTMENT COMMITTEE :  
OF THE CITIGROUP INC. 401(K) PLAN), :

Defendants. :

FRANCIA BRICK, individually and on :  
Behalf of all others similarly situated, :

Plaintiff, :

v.

Civil Action No: 07 Civ. 11369

CITIGROUP INC., CHARLES PRINCE, :  
THE PLAN'S ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP, INC., :  
THE 401(k) INVESTMENT COMMITTEE, :  
And JOHN DOES 1-10, :

Defendants. :

-----x  
WILLIAM and PATRICIA WOODWARD, :  
individually and on Behalf of All Others :  
Similarly Situated, :

Plaintiffs, : Civil Action No: 07cv11207

v.

CITIGROUP INC., CHARLES PRINCE, :  
ROBERT E. RUBIN, C. MICHAEL :  
ARMSTRONG, ALAIN J. P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ RAMIREZ, ANDREW N. :  
LIVERIS, ANN MULCAHEY, RICHARD :  
D. PARSONS, JUDITH RODIN, ROBERT :  
L. RYAN, FRANKLIN A. THOMAS, ANN :  
DIBBLE JORDAN, KLAUS KLEINFELD :  
AND DUDLEY C. MECUM, and JOHN :  
and JANE DOES 1-10, :

Defendants. :

This matter coming before the Court by Motion submitted by Lynda J. Grant,  
seeking the admission of Michelle C. Yau to the United States District Court for the  
Southern District of New York *pro hac vice* for purposes of this action, and the Court  
having considered the Affidavit of Michelle C. Yau submitted in support thereof, and for  
good cause shown,

IT IS ON this \_\_\_\_\_ day of \_\_\_\_\_, 2008,

ORDERED that:

1. Michelle C. Yau is hereby granted admission *pro hac vice* to the  
United States District Court for the Southern District of New York, for the purpose of

appearing in this action, pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York;

2. Michelle C. Yau is required to abide by and is subject to the Local Rules of the United States District Court for the Southern District of New York; and
3. Michelle C. Yau is required to notify the Court immediately of any matter that affects his standing at the Bar of any court.

---

United States District Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

<hr style="border-top: 1px dashed black;"/>		x
STEPHEN GRAY, individually and on behalf of all others similarly situated,	:	
Plaintiff,	:	Civil Action No: 07 Civ. 9790 (SHS)
v.	:	
CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,	:	
Defendants.	:	
<hr style="border-top: 1px dashed black;"/>		x
SHAUN ROSE, Individually and On Behalf of All Others Similarly Situated,	:	
Plaintiff,	:	Civil Action No: 07 Civ. 10294
v.	:	
CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 10,	:	
Defendants.	:	
<hr style="border-top: 1px dashed black;"/>		x
MEREDITH TRANBERG, individually and on behalf of all others similarly situated	:	
Plaintiff,	:	Civil Action No: 07 Civ. 10341
v.	:	
CITIGROUP INC., CHARLES PRINCE, THE PLANS ADMINISTRATIVE COMMITTEE OF CITIGROUP INC., THE 401(k) INVESTMENT COMMITTEE, and JOHN DOES 1 - 20,	:	
Defendants.	:	
<hr style="border-top: 1px dashed black;"/>		x

-----x  
 ANTON RAPPOLD, individually and on :  
 behalf of all others similarly situated, :  
 Plaintiff, : Civil Action No: 07 Civ. 10396  
 v. :  
 CITIGROUP INC., CITIBANK, N.A., :  
 CHARLES PRINCE, THE PLANS :  
 ADMINISTRATIVE COMMITTEE OF :  
 CITIGROUP INC., THE 401(k) :  
 INVESTMENT COMMITTEE, and JOHN :  
 and JANE DOES 1 - 10, :  
 Defendants. :  
 -----x  
 SAMIER TADROS, on Behalf of All :  
 Others Similarly Situated, :  
 Plaintiff, : Civil Action No: 07 Civ. 10442  
 v. :  
 CITIGROUP INC., CHARLES O. :  
 PRINCE, C. MICHAEL ARMSTRONG, :  
 ALAIN J.P. BELDA, GEORGE DAVID, :  
 KENNETH T. DERR, JOHN M. DEUTCH, :  
 ROBERTO HERNANDEZ RAMIREZ, :  
 ANN DIBBLE JORDAN, KLAUS :  
 KLEINFELD, ANDREW N. LIVERIS, :  
 ANNE MULCAHY, RICHARD D. :  
 PARSONS, JUDITH RODIN, ROBERT E. :  
 RUBIN, ROBERT E. RUBIN, FRANKLIN :  
 A. THOMAS, JOHN DOES 1-20 (BEING :  
 CURRENT AND FORMER MEMBERS :  
 OF THE PLANS ADMINISTRATIVE :  
 COMMITTEE OF CITIGROUP INC.) :  
 and JOHN DOES 21-40 (BEING :  
 CURRENT AND FORMER MEMBERS :  
 OF THE INVESTMENT COMMITTEE :  
 OF THE CITIGROUP INC. 401(K) PLAN), :  
 Defendants. :  
 -----x

-----x  
STEPHAN FIORINO, individually and on :  
behalf of all others similarly situated, :

Plaintiff, : Civil Action No: 07 Civ. 10458  
v. :

CITIGROUP INC., CITIBANK N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and :  
JOHN DOES 1 - 20, :

Defendants. :

-----x  
JAMES BOLLA, individually and on behalf :  
of all others similarly situated, :

Plaintiff, : Civil Action No: 07 Civ. 10461  
v. :

CITIGROUP INC., CITIBANK N.A., :  
CHARLES PRINCE, THE PLANS :  
ADMINISTRATIVE COMMITTEE OF :  
CITIGROUP INC., THE 401(k) :  
INVESTMENT COMMITTEE, and :  
JOHN DOES 1 - 20, :

Defendants. :

-----x

-----x  
MARK GEROULO, individually, on behalf :  
of the CITIGROUP 401(k) Plan, the :  
CITIBUILDER 401 (K) PLAN FOR :  
PUERTO RICO, and all others similarly, :  
:  
Plaintiff, : Civil Action No: 07 Civ. 10472  
v. :  
:  
CITIGROUP, INC., CITIBANK, N.A., :  
THE PLAN ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP, INC., :  
MICHAEL E. SCHLEIN, JOHN DOES :  
1-10, THE CITIGROUP 401(k) PLAN :  
INVESTMENT COMMITTEE and JOHN :  
DOES 10-20, C. MICHAEL :  
ARMSTRONG, ALAN J.P. BELDA, :  
GEORGE DAVID, KENNETH T. DERR, :  
JOHN M. DEUTCH, ROBERTO :  
HERNANDEZ, ANN DIBBLE JORDAN, :  
ANDREW N. LIVERIS, DUDLEY C. :  
MECUM, ANNE M. MULCAHY, :  
RICHARD D. PARSONS, ANDRALL E. :  
PEARSON, CHARLES PRINCE, JUDITH :  
RODIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, SANFORD I. WEILL, :  
:  
Defendants. :  
-----x

-----x

ALAN STEVENS, on Behalf of Himself and All Others Similarly Situated,	:	
Plaintiff,	:	Civil Action No: 07 Civ. 11156
v.	:	
CITIGROUP INC., CITIBANK, N.A., CHARLES PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, PETER JOHNSON, ROBERTO HERNANDEZ RAMIREZ, ANDREW N. LIVERIS, ANNE MULCAHEY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. RUBIN, ROBERT L. RYAN, FRANKLIN A. THOMAS, THE PLANS ADMINISTRATION COMMITTEE OF CITIGROUP, INC., THE INVESTMENT COMMITTEE and JOHN DOES 1-30,	:	
Defendants.	:	
STEPHEN GOLDSTEIN, on Behalf of Himself and a Class of Persons Similarly Situated,	:	
Plaintiff,	:	Civil Action No: 07 Civ. 11158
v.	:	
CITIGROUP INC., THE PLANS ADMINISTRATION COMMITTEE OF CITIGROUP, INC., MICHAEL E. SCHLEIN, CHARLES PRINCE, C. MICHAEL ARMSTRONG, ALAIN J.P. BELDA, GEORGE DAVID, KENNETH T. DERR, JOHN M. DEUTCH, ROBERTO HERNANDEZ RAMIREZ, ANDREW N. LIVERIS, ANNE MULCAHEY, RICHARD D. PARSONS, JUDITH RODIN, ROBERT E. RUBIN, ROBERT L. RYAN, AND FRANKLIN A. THOMAS, And JOHN DOES 1-30,	:	
Defendants.	:	

-----x  
CHRIS SOUTHARD, on Behalf of All :  
Others Similarly Situated, :  
Plaintiff, : Civil Action No: 07 Civ. 11164  
v. :  
CITIGROUP INC., CHARLES O. :  
PRINCE, C. MICHAEL ARMSTRONG, :  
ALAIN J.P. BELDA, GEORGE DAVID, :  
KENNETH T. DERR, JOHN M. DEUTCH, :  
ROBERTO HERNANDEZ RAMIREZ, :  
ANN DIBBLE JORDAN, KLAUS :  
KLEINFELD, ANDREW N. LIVERIS, :  
ANNE MULCAHY, RICHARD D. :  
PARSONS, JUDITH RODIN, ROBERT E. :  
RUBIN, ROBERT E. RUBIN, FRANKLIN :  
A. THOMAS, JOHN DOES 1-20 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE PLANS ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP INC.) :  
and JOHN DOES 21-40 (BEING :  
CURRENT AND FORMER MEMBERS :  
OF THE INVESTMENT COMMITTEE :  
OF THE CITIGROUP INC. 401(K) PLAN), :  
Defendants. :  
-----  
FRANCIA BRICK, individually and on :  
Behalf of all others similarly situated, :  
Plaintiff, : Civil Action No: 07 Civ. 11369  
v. :  
CITIGROUP INC., CHARLES PRINCE, :  
THE PLAN'S ADMINISTRATIVE :  
COMMITTEE OF CITIGROUP, INC., :  
THE 401(k) INVESTMENT COMMITTEE, :  
And JOHN DOES 1-10, :  
Defendants.  
-----

-----x  
 WILLIAM and PATRICIA WOODWARD, :  
 individually and on Behalf of All Others :  
 Similarly Situated, :  
 :  
 Plaintiffs, : Civil Action No: 07cv11207  
 v. :  
 :  
 CITIGROUP INC., CHARLES PRINCE, :  
 ROBERT E. RUBIN, C. MICHAEL :  
 ARMSTRONG, ALAIN J. P. BELDA, :  
 GEORGE DAVID, KENNETH T. DERR, :  
 JOHN M. DEUTCH, ROBERTO :  
 HERNANDEZ RAMIREZ, ANDREW N. :  
 LIVERIS, ANN MULCAHEY, RICHARD :  
 D. PARSONS, JUDITH RODIN, ROBERT :  
 L. RYAN, FRANKLIN A. THOMAS, ANN :  
 DIBBLE JORDAN, KLAUS KLEINFELD :  
 AND DUDLEY C. MECUM, and JOHN :  
 and JANE DOES 1-10, :  
 :  
 Defendants. :  
 -----

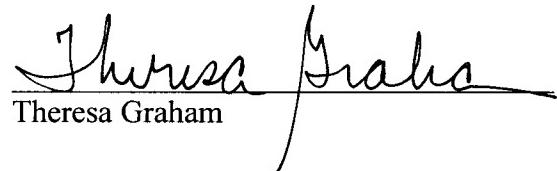
**CERTIFICATE OF SERVICE**

I, Theresa Graham, hereby certify that I am over the age of 18, and am employed by the Law Firm of Cohen, Milstein, Hausfeld & Toll, P.L.L.C. On this 21<sup>st</sup> day of January, 2008, I caused true and accurate copies of the foregoing Notice of Motion to Admit Michelle C. Yau *Pro Hac Vice*, Declaration of Lynda J. Grant in Support of Motion to Admit Counsel *Pro Hac Vice*, Affidavit of Michelle C. Yau in Support of Motion to Admit Counsel *Pro Hac Vice* and the Certificate of Good Standing attached thereto, and Proposed Order for Admission *Pro Hac Vice* on Written Motion, via First-Class mail, upon the following counsel of record:

**Citigroup ERISA Litigation Service List**

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Theresa Graham